

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NO LABELS,

Plaintiff,

v.

NOLABELS.COM INC.,

Defendant.

Case No. _____

DECLARATION OF ELISABETH PATRICIA LOVE

I, Elisabeth Patricia (“Pat”) Love, do hereby declare and state the following based on first-hand knowledge:

1. I am an author and retired licensed marriage and family therapist who lives in Austin, Texas. I received a Doctorate of Education from West Virginia University. I am a former tenured associate professor at Texas A&M University and established the Austin Family Institute in Austin, Texas.

2. I submit this declaration in support of *Plaintiff’s Application for Temporary Restraining Order and/or Motion for Preliminary Injunction*.

3. If called as a witness, I could and would testify competently to the information detailed in this declaration.

4. Approximately eight to nine months ago, I became aware of Plaintiff No Labels (“No Labels”) through Dorsey Cartwright, a citizen leader for No Labels in Texas. Unrelated to No Labels, Dorsey and I had been friends and colleagues for over 30 years.

5. Dorsey and I have since had several conversations about No Labels so that I could learn more about this non-profit organization and its stated goals. I also reviewed certain materials and links about No Labels that Dorsey sent to me. I specifically recall from these

discussions and materials that No Labels described itself as a “commonsense majority” and “problem solvers.” I understood No Labels to be an outlet for new political thought and ideas in today’s political environment.

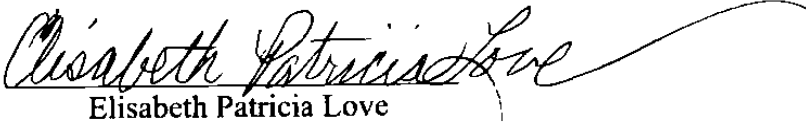
6. On or around November 25, 2023, I set out to visit No Labels’ website. To do this, I searched Google for “No Labels Texas.” I had never seen the No Labels website and did not know the URL for the website. The search brought me to a website located at <https://www.nolabels.com>, which I assumed was the No Labels’ website. I reviewed the website and recognized Dorsey’s references to “commonsense majority” and “problem solvers,” so I continued to believe that I was on No Labels’ website. However, I became concerned by the content because the website displayed several right wing GOP leaders, including Donald Trump, as being representative of the Commonsense Majority, and it provided a link to join what seemed to be a movement associated with the right wing of the GOP. That was contrary to what I understood (from Dorsey) to be the driving purpose behind No Labels.

7. After reviewing this website, I sent an email to Dorsey with the [nolabels.com](https://www.nolabels.com) website link I accessed and asked her, “So I’m curious why all the recognizable photos in this sign up sheet show GOP right wingers with the ‘problem solvers’ labels on them. Perhaps I am missing something.” A true and accurate copy of the email I sent to Dorsey dated November 25, 2023 is attached as Exhibit 1.

8. In response, I learned from Dorsey that the website I accessed at <https://www.nolabels.com> was not, contrary to my belief, the official No Labels website. Rather, the official No Labels website was located at <https://www.nolabels.org>.

9. I declare under penalty of perjury as provided by law that the statements contained in this declaration are true and correct to the best of my knowledge and belief.

EXECUTED this 5th, day of December, 2023 in Austin, Texas.


Elisabeth Patricia Love